



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ELM  
F. #2015F01787

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 8, 2017

By FedEx and ECF

Robert J. Cleary, Esq.  
Dietrich L. Snell, Esq.  
Proskauer Rose LLP  
Eleven Times Square  
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang  
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government's filter team hereby furnishes discovery with respect to the above-captioned matter. This disclosure supplements the filter team's earlier disclosures under cover of letters dated May 24, 2017 and July 12, 2017.

Enclosed are copies of additional emails sent to or received by the email account associated with the address "zhongdan515@msn.com" (the "Zhong Email Account"), beyond those previously produced, which bear Bates numbers DZFILTER00004978-DZFILTER00012222. This production includes the remaining emails in the filter team's possession that the filter team was able to identify as sent to or received by the Zhong Email Account. Please note that these materials may contain privileged attorney-client communications. The prosecution team has not reviewed these materials. This production by the government's filter team has not been deduplicated against any prior document productions.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

BRIDGET M. ROHDE  
Acting United States Attorney

By: /s/ Elizabeth L. Macchiaverna  
Elizabeth L. Macchiaverna  
Assistant U.S. Attorney  
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cc: Clerk of the Court (DLI) (by ECF)